

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD) (SN)
ECF Case

This document relates to All Actions

**DECLARATION OF MEGAN W. BENETT, ESQ. IN SUPPORT OF MOTION TO
COMPEL DEPOSITION OF AKRAM MOHAMED ALZAMARI**

Megan W. Bennett, Esq., hereby declares under penalty of perjury that:

1. I am an attorney duly admitted before the Courts of New York State and this Court, am a partner of Kreindler & Krienlder LLP, attorneys for Plaintiffs, and am familiar with the litigation and prior proceedings relevant to the subject motion.

2. I submit this declaration in support of the Plaintiffs' Motion to Compel an Oral Deposition of Hostile Witness Akram Alzamari Pursuant to Fed.R.Civ.P. 26 and 30.

3. Plaintiffs are conducting court-ordered discovery in the underlying 9/11 litigation and file the motion described above after reviewing the transcript and video recording of the deposition by written questions conducted on March 11, 2020.

4. Attached hereto as Exhibit A (filed under seal) is a true and accurate copy of the direct examination questions that Plaintiffs were allowed to have the court reporter pose to Alzamari during the March 11, 2020 deposition by written questions, outside of the presence of counsel for the parties.

5. Attached hereto as Exhibit B (filed under seal) is a true and accurate copy of the transcript of the March 11, 2020 deposition by written questions and all exhibits included in that deposition.

6. Attached hereto as Exhibit C is a true and accurate copy of the April 21, 2020 declaration of Plaintiffs' investigator Catherine Mannherz Hunt.

7. Attached hereto as Exhibit D is a true and accurate copy of the September 26, 2018 declaration of Plaintiffs' investigator Catherine Mannherz Hunt, which was furnished in September 2018 to the Department of Justice and subsequently filed separately in the case record.

8. Filed herewith as Exhibit E (filed under seal) is a CD containing a file labeled "Alzamari Deposition Video" that is a true and accurate video recording by the court reporting service of the March 11, 2020 deposition by written questions.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 24th day of April 2020.

/s/ Megan W. Benett
Megan W. Benett, Esq.